

REMARKS

In the Final Office Action of January 28, 2008, claims 1-3, 7-9, 26 and 28-30 were rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over U.S. Patent No. 5,801,777 (hereinafter “Lyu”) in view of U.S. Patent No. 4,989,092 (hereinafter “Doyle et al.”). In addition, claims 4-6 and 27 were rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Lyu and Doyle et al. in view of U.S. Patent No. 5,329,319 (hereinafter “Sgrignoli”). Furthermore, claims 10-25 were rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Lyu, Doyle et al. in view of U.S. Patent No. 5,818,419 (hereinafter “Tajima et al.”).

In response, Applicants respectfully assert that the independent claims 1, 26 and 28 are not obvious in view of the cited references of Lyu and Doyle et al., as explained below. In view of the following remarks, Applicants respectfully request the allowance of the pending claims 1-30.

A. Patentability of Independent Claims 1, 26 and 28

The independent claim 1 recites “*wherein the first and second transpose means are configured to perform the first and second transpose processes to convert the received video data to the fully re-ordered video data that is a transposed video data of the received video data, the fully re-ordered video data being compatible to a transposed scanning technique for driving the display,*” which is not disclosed in the cited references of Lyu and Doyle et al. Thus, the independent claim 1 is not obvious in view of these cited references. As such, Applicants respectfully request that the independent claim 1 be allowed.

The Office Action on page 3 correctly states that the cited reference of Lyu does not disclose “the first and second transpose means are configured to perform the first and second transpose processes to convert the received video data to the fully re-ordered video data that is a transposed video data of the received video data, the fully re-ordered video data being compatible to a transposed scanning technique for driving

the display.” However, the Office Action then states that the cited reference of Doyle et al. “teaches wherein the first (e.g., a first clock signal for sampling the incoming video signal, see the bridging paragraph of columns 2-3) and second transpose (e.g., a second clock signal for controlling that scan direction transposition circuit for assigning picture information to elements of the vertical lines, see the bridging paragraph of columns 2-3) means are configured to perform the first and second transpose processes to convert the received video data to the fully re-ordered video data (note: the combination of the first clock signal and the second clock are considered as a fully re-ordered video data).” Then the Office Action alleges that “it would have been obvious to a person skill in the art at the time of the invention to combine Doyle into Lyu’s converter system i.e. employed a VLD with DCT (col. 3 lines 37-61), because Doyle’s synchronization signals would ensure to synchronize the signals with the picture information, and it would be beneficial to scan different systems with reduced dissipation in a picture, e.g., PAL and NTSC systems.” Applicants respectfully disagree with this analysis.

First of all, “a first clock signal” and “a second clock signal” described in Doyle et al. cannot be equated to the claimed “*first transpose means*” and the claimed “*second transpose means*,” respectively, as alleged in the Office Action. A signal cannot be equated to a means-plus-function element, such as the claimed “*first transpose means*.” The “*first transpose means*” is recited as a means “*for receiving video data and performing a first transpose process on such video data to create partially re-ordered video data.*” Clearly, a clock signal cannot receive video data and perform a first transpose process on such video data to create partially re-ordered video data. Consequently, the first and second clock signals described in Doyle et al. cannot be equated to the claimed “*first transpose means*” and the claimed “*second transpose means*,” respectively. Therefore, the cited reference of Doyle et al. does not teach “*wherein the first and second transpose means are configured to perform the first and second transpose processes to convert the received video data to the fully re-ordered video data that is a transposed video data of the received video data, the fully re-ordered video data being compatible to a transposed scanning technique for driving the display,*” as recited in the independent claim 1.

Second of all, the combination of the first clock signal and the second clock signal cannot be considered as a fully re-ordered video data, as alleged in the Office Action. Clock signals are merely timing signals. Thus, clock signals even when combined cannot be considered as a fully re-ordered video data converted from received video data, which further supports the conclusion that the cited reference of Doyle et al. does not teach “*wherein the first and second transpose means are configured to perform the first and second transpose processes to convert the received video data to the fully re-ordered video data that is a transposed video data of the received video data, the fully re-ordered video data being compatible to a transposed scanning technique for driving the display,*” as recited in the independent claim 1.

Since both of the cited references of Lyu and Doyle et al. do not disclose the claimed limitations of “*wherein the first and second transpose means are configured to perform the first and second transpose processes to convert the received video data to the fully re-ordered video data that is a transposed video data of the received video data, the fully re-ordered video data being compatible to a transposed scanning technique for driving the display,*” the independent claim 1 is not obvious in view of these references. As such, Applicants respectfully request that the independent claim 1 be allowed.

The above remarks are also applicable to the independent claims 26 and 28, which recite similar limitations as those of the independent claim 1. Therefore, Applicants respectfully assert that the independent claims 26 and 28 are also not obvious in view of the cited references of Lyu and Doyle et al., and request that these independent claims be allowed as well.

B. Patentability of Dependent Claims 2-25, 27, 29 and 30

Each of the dependent claims 2-25, 27, 29 and 30 depends on one of the independent claims 1, 26 and 28. As such, these dependent claims include all the limitations of their respective base claims. Therefore, Applicants submit that these dependent claims are allowable for at least the same reasons as their respective base claims.

As an example, the dependent claim 2 recites “*wherein the first and second transpose means include: one or more programmable hardware blocks.*” The Office Action on page 4 states that the cited reference of Lyu discloses this limitation and refers to an inverse DCT converting part in Fig. 3. However, the inverse DCT converting part of Lyu is not described as being a programmable hardware block. Thus, the dependent claim 2 is not obvious in view of the cited references of Lyu and Doyle et al.

As another example, the dependent claim 3 recites wherein “*the first transpose means includes a first programmable processor and the second transpose means includes a second programmable processor, such that the apparatus is programmable for any of a plurality of display formats.*” The Office Action on page 5 states that the cited reference of Lyu discloses this limitation and refers to the rejection of claim 1. However, the components in Fig. 1 of Lyu are not described as including first and second programmable processors. Thus, the dependent claim 3 is not obvious in view of the cited references of Lyu and Doyle et al.

Applicants respectfully request reconsideration of the claims in view of the remarks made herein. A notice of allowance is earnestly solicited.

Respectfully submitted,
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